

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

UNITED STATES OF AMERICA,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case No. 3:21-cv-173-KC (Consolidated)
	§	
THE STATE OF TEXAS; GREG ABBOTT, in	§	
his official capacity as Governor of Texas,	§	
	§	
Defendants.	§	
	§	
ANNUNCIATION HOUSE; ANGRY TIAS &		
ABUELAS OF THE RIO GRANDE VALLEY;	§	
JENNIFER HARBURY; FIEL HOUSTON,	§	
	§	
Consolidated Plaintiffs,	§	
	§	
v.	§	Case No. 3:21-cv-00178-KC
	§	
GREG ABBOTT, IN HIS OFFICIAL CAPACITY	§	
AS GOVERNOR OF TEXAS; STEVEN	§	
MCCRAW, IN HIS OFFICIAL CAPACITY AS	§	
DIRECTOR OF THE STATE OF TEXAS	§	
DEPARTMENT OF PUBLIC SAFETY,	§	
	§	
Consolidated Defendants.	§	

DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO REPLY

Defendants the State of Texas, Governor Greg Abbott in his official capacity as Governor of Texas (“Governor Abbott”), and Steven McCraw in his official capacity as Director of the State of Texas Department of Public Safety (“Director McCraw”) respectfully file this Unopposed

Motion for Extension of Time to file their Reply briefs in support of Defendants' Motions to Dismiss and in support thereof show the following:

1. Defendants request additional time until and including December 6, 2021 to file their Reply in support of Defendants' Motions to Dismiss (Dkts. 67 & 68). The current deadline to reply is Monday, November 15, 2021. This constitutes a three-week extension.
2. Plaintiffs are unopposed to the requested extension.
3. Undersigned counsel has been unable to devote the requisite time to prepare the Reply briefs, because she has been substantially occupied with briefing in other matters and was unexpectedly out of the office for two days of the extant seven-day reply period due to illness.
4. In order to provide the Court with full and sufficient briefing on these important and complex issues, and in light of the upcoming Thanksgiving holiday, Defendants respectfully request a 3-week extension.
5. This extension is not requested for the purpose of delay but so that justice may be done.

Defendants State of Texas, Governor Abbott, and Director McCraw respectfully request that this Court grant an extension of time to file reply briefs in support of their Motions to Dismiss, making the new deadline to reply **December 6, 2021**.

Dated: November 12, 2021

Respectfully submitted,

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Attorneys for Defendants

CERTIFICATE OF CONFERENCE

I hereby certify that the parties conferred via e-mail on November 11 & 12, 2021 about the subject matter of this motion and that counsel for Plaintiffs stated that they are not opposed.

/s/ Amy S. Hilton

AMY S. HILTON

Assistant Attorney General

CERTIFICATE OF SERVICE

I certify that on November 12, 2021 the foregoing document was filed via the Court's CM/ECF system, causing electronic service upon all counsel of record

/s/ Amy S. Hilton

AMY S. HILTON

Assistant Attorney General